

EXHIBIT 4

1 THOMAS E. PATTERSON (State Bar No. 130723)
 2 MICHAEL L. TUCHIN (State Bar No. 150375)
 3 COURTNEY E. POZMANTIER (State Bar No. 242103)
 4 KLEE, TUCHIN, BOGDANOFF & STERN LLP
 5 1999 Avenue of the Stars, 39th Floor
 Los Angeles, California 90067-6049
 Telephone: (310) 407-4000
 Facsimile: (310) 407-9090
 Email: cpozmantier@ktbslaw.com

6 Counsel for Cross-Defendant Laminar Direct Capital, L.P.

7
 8 **UNITED STATES BANKRUPTCY COURT**
 9 **NORTHERN DISTRICT OF CALIFORNIA**
 10 **SANTA ROSA DIVISION**

11 In re

Case No. 05-14659 AJ

12 THE LEGACY ESTATE GROUP, LLC, a
 13 California limited liability company,
 14 formerly doing business as FREEMARK
 15 ABBEY WINERY, BYRON VINEYARD &
 16 WINERY, AND ARROWOOD VINEYARD
 & WINERY,

Adv. No. 06-01173

Chapter 11

17 Debtor.

**LAMINAR DIRECT CAPITAL L.P.'S
 RESPONSE TO MOTION TO CERTIFY
 PROCEEDING TO DISTRICT COURT
 FOR TRIAL BY JURY PURSUANT TO
 BANKRUPTCY LOCAL RULE 9015-2**

18 OFFICIAL COMMITTEE OF
 19 UNSECURED CREDITORS OF THE
 20 LEGACY ESTATE GROUP, LLC,

Date: February 23, 2007

Time: 9:00 a.m.

Place: 99 S. "E" Street

21 Plaintiff,

Santa Rosa, CA 95404

22 v.

23 JOHN M. BRYAN, JOHN M. AND
 24 FLORENCE E. BRYAN TRUST, J.M.
 25 BRYAN FAMILY TRUST, KULWINDER
 26 SIDHU, DEVINDER SIDHU, PACIFIC
 27 PARAGON INVESTMENT FUND LTD, a
 British Columbia company, HARRY CHEW,
 28 and AIC CAPITAL PARTNERS, LLC, a
 California limited liability company,

Defendants.

JOHN M. BRYAN, JOHN M. AND
FLORENCE BRYAN TRUST, J.M. BRYAN
FAMILY TRUST,

Defendants/Cross-Claimants,

v.

KULWINDER SIDHU, DEVINDER
SIDHU, PACIFIC PARAGON
INVESTMENT FUND, LTD, a British
Columbia company, HARRY CHEW, AIC
CAPITAL PARTNERS, LLC, a California
limited liability company, and LAMINAR
DIRECT CAPITAL, L.P., a Texas limited
partnership,

Defendants/Cross-Defendants.

Laminar Direct Capital, L.P., a Cross-Defendant herein (“Laminar”), hereby submits its Response to the "Motion to Certify Proceeding to District Court for Trial by Jury Pursuant to Bankruptcy Local Rule 9015-2" filed by Defendants and Cross-Claimants John M. Bryan, John M. and Florence E. Bryan Trust and J.M. Bryan Family Trust.

Laminar reserves its right to a jury trial in this adversary proceeding. The Cross-Claim against Laminar and the other Cross-Defendants, however, represents only a small portion of this adversary proceeding. Therefore, Laminar respectfully submits that certification of this adversary proceeding should not occur unless and until a jury trial on the Cross-Claim or any other portion of the adversary proceeding is to take place. Administering this adversary proceeding as a whole in this Court until such time will facilitate the expeditious resolution of this adversary proceeding, and will reduce the expense associated with litigating this matter.

KLEE, TUCHIN, BOGDANOFF & STERN LLP

/s/ Courtney E. Pozmantier
COURTNEY E. POZMANTIER
Counsel for Cross-Defendant Laminar Direct
Capital, L.P.